



Fire Department

"Serving the community since 1926"

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November 16, 2007

Mr. Eric Gillies, Project Manager
California State Lands Commission
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Sacramento, CA 95825
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Project Title: Draft Environmental Impact Report for the PRC 421 Re-commissioning Project
SCH Number: 2005061013
CSLC EIR Number: 732
CSLC File Number: W30159.3

Dear Mr. Gillies:

Thank you for allowing me to comment on the Draft EIR for the PRC 421 Re-commissioning Project.

The Santa Barbara County Fire Department (SBCFD) currently operates five fire stations within the Goleta Planning Area; a sixth station, located in Mission Canyon (Station 15), assists in responding to calls in the eastern portion of Goleta. "The standards used to determine the fire protection service levels within Goleta are: (1) Population served; (2) Ratio of fire fighters to population; and (3) Five minute response time from the fire station location" (Goleta Community Plan, 115 and City of Goleta General Plan, 8-9 & 10).

SBCFD uses a standard of one engine company per 12,000 population, assuming three fire fighters per station. This standard represents the maximum population that can be adequately served. Fire Station 11 currently serves a population of 19,714, which exceeds this standard by almost 8,000 people. Due to the high amount of commercial/industrial square footage served by Engine 11, this number also swells with employees and the public during the daytime.

"The second fire protection standard is the ratio of fire fighters to population served. SBCFD uses a countywide level of service of one firefighter per 4,000 population as an absolute maximum population which can be adequately served" (Goleta Community Plan, 115 & City of Goleta General Plan, 8-9 & 10).

The third measurement of fire service standards is the five-minute response time. "One of the most critically under-served areas is the far west end of Goleta near Winchester Canyon" (Goleta Community Plan, 117). "SBCFD has determined that the most under-served area in Goleta is the extreme western portion near Winchester Canyon" (City of Goleta General Plan, 8-10).

The reactivation of oil production as proposed in this project will increase the need for services by Engine 11, which will in turn, increase the demands upon Engine 11 even more than currently exists. This development is also outside of the 5-minute response zone of the nearest Fire Station (Fire Station 11 at 6901 Frey Way). This creates emergency response times in excess of 7-9 minutes, approaching almost double what is considered acceptable in urbanized areas (City of Goleta General Plan, 8-10).

Due to the reactivation of oil production in the 421 lease area, the increase in demands upon Fire Station 11, and the distance from the nearest fire station, it is clear that a new fire station must be constructed and staffed in order to support any further large development in the Western Goleta Valley. The City of Goleta, SBCFD and all affected applicants are currently working on a plan that will provide documentation of all of the required funding and sources of such funding for the new fire station. Until such documentation is finalized, this impact must be considered a Class I impact, not a Class II impact, as indicated in the DEIR.

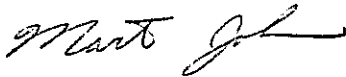
Furthermore, while Mitigation Measure PS-1 provides for mitigation of this impact, it states that "Venoco and CSLC in consultation with City of Goleta staff and the Santa Barbara County Fire Department" will determine the amount of the development impact fee that will contribute to the need for a new fire station in Goleta. This must be changed to read that the *City of Goleta and the Santa Barbara County Fire Department (SBCFD)* will determine the amount of this fee as the new fire station is an issue completely within the jurisdiction of the City of Goleta and SBCFD, and the fees paid by this project will be determined through fair-share fee analysis in conjunction with other City projects that will contribute to the acquisition of property for, and the construction of, the future county fire station.

In addition to Mitigation Measure PS-1, SBCFD has determined that another mitigation measure requiring fire water supply infrastructure upgrades in the form of water main line

extensions and new fire hydrants connected to the Goleta Water District in and around the project site will be required.

If you have any questions or need additional clarification please do not hesitate to contact me at (805) 681-5528

Yours in the interest of life and fire safety,

A handwritten signature in black ink, appearing to read "Mart Johnson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Martin Johnson, Captain
Fire Prevention Division

c: City of Goleta, Attn Laura Vlk, Planner